

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

WAYNE DOUGLAS COBB, as
Co-Administrator of the Estate of
Jennifer Autumn Cobb, deceased, and
SUSAN MOON COBB, as Co-
Administrator of the Estate of Jennifer
Autumn Cobb,

Plaintiffs,

vs.

JEREMY “BOB” GREEN *and* YOUNG
MEN’S CHRISTIAN ASSOCIATION
OF GEORGIA’S PIEDMONT, INC.,

Defendants.

CIVIL ACTION FILE NO.
2:23-CV-130-SCJ

**SECOND AMENDED NOTICE OF TAKING VIDEOTAPED DEPOSITION
OF PLAINTIFF SUSAN COBB**

TO: Plaintiff Susan Cobb
c/o Kara E. Phillips
Deitch & Rogers, LLC
1189 S. Ponce de Leon Ave. NE
Atlanta, Georgia 30306
kara@victimattorneys.com

YOU ARE HEREBY NOTIFIED that on **Monday, June 17, 2024**,
beginning at **10:00 a.m. EST**, the Defendant will proceed to take the videotaped
deposition of **PLAINTIFF SUSAN COBB** for purposes of discovery and cross-
examination pursuant to the provisions of Rule 30 of the Federal Rules of Civil

Procedure. The deposition will be taken at the office of **Deitch & Rogers, 1189 S. Ponce de Leon Ave., NE, Atlanta, GA 30306** before a court reporter provided by the Defendant.

The examination will continue from day to day until completed and may be recorded through videographic and stenographic means. The deponent is hereby requested and instructed to produce at the deposition the documents set out in Exhibit “A” attached hereto.

YOU ARE INVITED TO ATTEND.

This 10th day of May, 2024.

Respectfully submitted,

/s/ LeeAnn Jones

BRYNDA RODRIGUEZ INSLEY

Georgia Bar No. 611435

LEEANN JONES

Georgia Bar No. 402440

JENNIFER L. CLARK

Georgia Bar No. 391855

Attorneys for Defendant

*Young Men's Christian Association of
Georgia's Piedmont, Inc.*

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EXHIBIT "A"

1. All documents, notes, diaries, letters, reports, statements, recordings, photographs, electronic communications, or other tangible things documenting, recording, reflecting or otherwise pertaining in any way to the allegations in Plaintiff's Complaint.
2. All documents, notes, diaries, letters, reports, statements, recordings, photographs, electronic communications, or other tangible things documenting, recording, reflecting or otherwise referring to Jennifer Cobb's alleged injuries, damages, medical specials, loss wage specials or liens.
3. All documents, notes, diaries, letters, reports, statements, recordings, photographs, electronic communications, or other tangible things documenting, recording, reflecting or otherwise pertaining in any way to the subject incident(s), or any pre- or post- incident information that pertains in any way to the subject incident(s).
4. All documents, notes, diaries, letters, reports, statements, recordings, photographs, electronic communications, or other tangible things documenting, recording, reflecting or otherwise referring to any communications (either verbal or in writing) between Plaintiffs, Jennifer Cobb, and/or Austin Cobb, and the Defendants or any agent or representative of the Defendants .
5. All documents or other materials responsive to Defendant's First Interrogatories and Requests for Production of Documents to Plaintiff.
6. A complete and accurate copy of any and all documents, materials or tangible thing which you have reviewed to refresh your recollection of the events pertinent to this case for your expected testimony.
7. All updated medical records regarding any physical or mental health evaluation, diagnosis, treatment, or care received by Jennifer Cobb related to the allegations in Plaintiff's Complaint.
8. All photographs, video or audio recordings, social media posts, emails, text messages, or communications of any kind related to the circumstances of this case, alleged injuries sustained by Jennifer Cobb, or the conduct of the

Plaintiffs, Jennifer Cobb, or Defendants in connection with the facts forming the basis of this lawsuit.

IF ANY DOCUMENTS ARE WITHHELD IN RESPONSE TO THIS NOTICE OR IT IS OTHERWISE NOT FULLY COMPLIED WITH, IDENTIFY SAID DOCUMENTS BEING WITHHELD OR OTHERWISE NOT BEING PRODUCED, BY FORM (BOOK, LETTER, ETC.), DATE, AUTHOR, PERSON(S) TO WHOM COPIES HAVE BEEN TRANSMITTED, AND PROVIDE A GENERAL DESCRIPTION OF THE CONTENT OF THE DOCUMENT TO ASSIST THE COURT IN THE EVENT OF A MOTION TO COMPEL.

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of SECOND AMENDED NOTICE OF TAKING VIDEOTAPED DEPOSITION OF PLAINTIFF SUSAN COBB upon all parties to this matter by PACER and by email to the counsel of record as follows:

<u>Attorneys for Plaintiff:</u> Gilbert H. Deitch Andrew T. Rogers Kara E. Phillips W. Michael D'Antignac Deitch & Rogers, LLC 1189 S. Ponce de Leon Ave. NE Atlanta, Georgia 30306 gil@victimattorneys.com andy@victimattorneys.com kara@victimattorneys.com michael@victimattorneys.com	<u>Attorneys for Plaintiff:</u> Naveen Ramachandrappa E. Allen Page Bondurant Mixson & Elmore LLP 1201 W. Peachtree Street NW Suite 3900 Atlanta, Georgia 30309 ramachandrappa@bmelaw.com page@bmelaw.com
<u>Attorneys for Plaintiff:</u> Dennis T. Cathey Matthew A. Cathey Cathey & Strain, LLC 649 Irvin Street Cornelia, Georgia 30531-3267 DCathey@catheyandstrain.com MCathey@catheyandstrain.com	<u>Attorneys for Co-Defendant</u> <u>Jeremy Bob Green:</u> William Brent Ney Georgia Bar No. 542519 Ney Rhein Williams, LLC 265 South Culver Street Lawrenceville, GA 30046 william@neyrhein.com
<u>Co-Counsel for Defendant</u> <u>Young Men's Christian Association of</u> <u>Georgia's Piedmont, Inc.:</u> Laurie Webb Daniel Webb Daniel Friedlander LLP 75 14 th Street NE, Suite 2450 Atlanta, Georgia 30309	<u>Co-Counsel for Co-Defendant</u> <u>Jeremy Bob Green:</u> Jon D. Stewart, Jr. Georgia Bar No. 681555 SWIFT, CURRIE, McGHEE & HIERS, LLP 1420 Peachtree Street, N.E. Suite 800

laurie.daniel@webbdaniel.law	Atlanta, Georgia 30309-3238 jon.stewart@swiftcurrie.com
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This 10th day of May, 2024.

Respectfully submitted,

/s/ LeeAnn Jones

BRYNDA RODRIGUEZ INSLEY

Georgia Bar No. 611435

LEEANN JONES

Georgia Bar No. 402440

JENNIFER L. CLARK

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel hereby certifies that the foregoing pleading was prepared in Times New Roman 14-point font, in compliance with Local Rule 5.1(C).

This 8th day of March, 2024.

Respectfully submitted,

/s/ LeeAnn Jones
BRYNDA RODRIGUEZ INSLEY
Georgia Bar No. 611435
LEEANN JONES
Georgia Bar No. 402440
JENNIFER L. CLARK
Georgia Bar No. 391855

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